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February 15, 2005

USDA-AMS-TMP-NOP

Attention: Ms. Francine Torres, Administrator  
1400 Independence Avenue, SW., Room 4008-So  
AG Stop 0268  
Washington, D.C. 20250-0200

**RE: PASTURE REQUIREMENTS ARE VITAL TO ORGANIC STANDARDS**

Dear Ms. Torres,

I would like to express my strong support for the recommendations from the National Organic Standards Board Livestock Committee from February 1, 2005, regarding pasture requirements for the National Organic Program. As a conscious organic consumer, I need to know that the USDA organic seal represents the true meaning of "organic" which includes pasturing of animals as outlined in the new recommendation.

I firmly believe requiring pasture for ruminants ensures an organic production system which provides living conditions that allow animals to satisfy their natural behavior patterns, provides preventative health care benefits and answers my expectation of humane animal care and ideal welfare.

Providing cows access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity.

Animals utilizing pasture naturally avoid the concentration of manure issues associated with dry lot production. Allowing the cows to go to their food rather than bringing feed to the cows means less use of machinery and non-renewable resources.

Active management of quality pasture is an excellent way to improve soil quality. Careful rotation of pasture ensures maximum utilization of the capture of solar energy, the basis for growing all food. Allowing some pasture areas to be fallow for a portion of the season benefits biodiversity by providing habitat for grassland birds.

A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene and

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higher in omega 3 essential fatty acids than conventional milk. This study tied these qualities to organic cows having more room to graze and a diet high in forage, fresh grass and clover.

For these reasons, I would like to support the Livestock Committee's recommendation that grazed feed must provide a significant portion of the total feed requirements. I firmly believe that lactation of dairy animals is not a stage of production under which animals may be denied pasture for grazing. I would like to see these recommendations be incorporated into the standards as mandated production practices.

Thank you for your time.

Respectfully,



Tina M. Nicolosi

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cc: Organic Valley Family of Farms